

Mr. James R. Carson
Ispat Inland Inc.
3210 Watling Street
East Chicago, Indiana 46312

Re: Minor Source Modification No.: 089-12601-00316

Dear Mr. Carson:

On November 29, 2000, a letter requesting transfer of ownership of excess VOC emission reduction credits was received from Whiting Clean Energy located in Whiting, Indiana to Ispat Inland Inc. located in East Chicago, Indiana.

The VOC emission reduction credits transferred from Whiting Clean Energy to Ispat Inland Inc. is 260 tons. These emission reduction credits are allowed to be used under the preconstruction review program because these emissions have not been relied upon in the control strategy submitted to EPA to demonstrate attainment and maintenance of ambient air quality standards. In accordance with 326 IAC 2-3-4, these emission reduction credits are valid:

- (a) As long as the credits are relied upon by the end of December 2003, plus time for construction
- (b) Does not interfere with the attainment and maintenance of ambient air quality standards; and
- (c) Does not violate any other condition set forth in 326 IAC 2-3.

This transfer of the VOC emissions will be incorporated into the pending Part 70 permit application T089-6577-00316 pursuant to 326 IAC 2-7-10.5(l)(3).

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter call (800) 451-6027, press 0 and ask for Teresa Freeman or ask for extension 4-1243, or dial (317) 234-1243.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments

TLF

cc: File - Lake County
U.S. EPA, Region V
Air Compliance Section Inspector - Rick Massoels
IDEM Northwest Regional Office
Permit Tracking - Janet Mobley
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for Transfer of VOC Credit Emissions

Source Background and Description

Source Name: ISPAT Inland Inc.
 Source Location: 3210 Watling Street, East Chicago, Indiana 46312
 County: Lake
 Minor Source Modification: 089-12601-00316
 SIC Code: 3312
 Permit Reviewer: Teresa Freeman

The Office of Air Management (OAM) performed VOC and NO_x emission reduction credit (ERC) reviews involving Whiting Clean Energy, ISPAT Inland Inc. and BP Amoco Oil-Whiting Refinery. These three (3) sources are all located in Lake County. On July 20, 2000, Whiting Clean Energy, Inc. was issued a permit (CP-089-11194-00449) for the construction and operation of an industrial steam and electric power cogeneration plant. The construction of this source was dependent upon the acquisition of emission offset credits for both nitrogen oxides (NO_x) and volatile organic compounds (VOC) emissions from other sources. The required emission reduction credits were obtained from the following sources:

Source	Source Air Permit ID	Facility	Emissions, tons	
			NO _x	VOC
BP Amoco - Whiting	089-00003	Lubes Unit		382
Ispat Inland, Inc.	089-00316	76" Hot Strip Mill	350	

On July 20, 2000, minor source modifications were issued to BP Amoco Oil-Whiting Refinery (089-11984-00003) and ISPAT Inland Inc. (089-12491-00316) to document the transfer of the emission reduction credits and the banking of any remaining emission reduction credits for these sources cited in their respective permits.

Whiting Clean Energy	VOC (tons)	NOx (tons)
ERCs purchased from BP Amoco Oil-Whiting Refinery	382	0
ERCs purchased from Ispat Inland, Inc.	0	350
ERCs Used for Cogeneration Plant	90.4	350
ERCs Available for Sale	291.6	0
ERCs Tranferred to Ispat Inland, Inc.	260.0	0
Available ERCs until December 2003 for WCE	31.6	0

On November 29,2000, Whiting Clean Energy in a letter requested the transfer of 260 tons of VOC emission reduction credits to Ispat Inland Inc., leaving a balance of 31.6 tons of VOC emission reduction credits which Whiting Clean Energy did not use from the total emission credits they purchased from BP Amoco Oil-Whiting Refinery. The following table summarizes the availability of VOC and NOx emission reduction credits given to Whiting Clean Energy and then the VOC emission reduction credits given to Ispat Inland Inc.:

ISPAT Inland Inc.	VOC (tons)	NOx (tons)
ERCs purchased from Whiting Clean Energy	260.0	NA
Available ERCs until December 2003	260.0	NA

The transfer of the available VOC emission reduction credits from Whiting Clean Energy to ISPAT Inland Inc. is reflected in Minor Source Modification 089-12601-00316 (ISPAT Inland, Inc.) and Minor Permit Modification 089-12600-00449 (Whiting Clean Energy).